

REMARKS

This application has been carefully reviewed in light of the Office Action dated November 4, 2009. Claims 1, 3 to 5, and 7 are in the application, with Claim 1 being independent. Claim 2 has been cancelled without prejudice. Reconsideration and further examination are respectfully requested.

Claims 1 to 4 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,369,316 (Plessing) in view of U.S. Patent No. 6,149,757 (Chikaki). Claim 5 was rejected under 35 U.S.C. § 103(a) over Plessing and Chikaki and further in view of U.S. Patent No. 6,127,622 (Yamada). Claim 7 was rejected under 35 U.S.C. § 103(a) over Plessing and Chikaki and further in view of U.S. Patent No. 4,426,633 (Taylor). Claims 1 to 4 were rejected under 35 U.S.C. § 103(a) over Plessing in view of U.S. Patent No. 6,041,840 (Ogawa). Claim 5 was rejected under 35 U.S.C. § 103(a) over Plessing and Ogawa and further in view of Yamada. Claim 7 was rejected under 35 U.S.C. § 103(a) over Plessing and Ogawa and further in view of Taylor. These rejections are respectfully traversed.

According to one feature as recited by Claim 1, the release sheet has an irregular form for allowing efficient ejection of air from the body.

None of Plessing, Chikaki, Yamada, Taylor, and Ogawa, even in the proposed combinations, assuming, *arguendo*, that such could be combined, is seen to disclose or suggest at least the above-discussed feature.

The Office Action alleges that Plessing's module stack 1, carrier plate 15, and separating films correspond, respectively, to the body to be laminated, the tabular member, and the release sheet recited by the instant claims. The Office Action further alleges that the separating films and the carrier plate 15 do not have perfectly flat surfaces

down to the atomic level and thus the surfaces have some measure of irregularity or an irregular form on the surfaces. However, Applicants respectfully submit that such irregularity does not allow for efficient ejection of air from the module stack.

Chikaki, Yamada, Taylor, and Ogawa are not seen to remedy the foregoing deficiencies of Plessing.

According to another feature as recited by Claim 1, the diaphragm is directly cooled by a fan after carrying out the body.

The applied documents are also not seen to disclose or suggest this feature.

With respect to Plessing and Chikaki, the Office Action asserts that a ventilation flow of air will exist between sequential laminations, and that this ventilation will have a cooling effect on the membrane. However, Applicants respectfully submit that neither Plessing nor Chikaki describes the use of a fan to directly cool a diaphragm.

With respect to Ogawa, this document is merely seen to describe that a laminated product is cooled by circulating a coolant through a flow path 7 in a upper platen
1. See col. 12, lines 2 to 10 of Ogawa. Nowhere is Ogawa seen to describe the use of a fan to directly cool a diaphragm.

Yamada and Taylor are not seen to remedy the foregoing deficiencies of Plessing, Chikaki, and Ogawa.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the claims and are dependent from the independent claim discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

The application is believed to be in condition for allowance, and a Notice of

Allowance is respectfully requested.

No fees are believed due; however, should it be determined that additional fees are required, the Director is hereby authorized to charge such fees to Deposit Account 06-1205.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office by telephone at (714) 540-8700. All correspondence should be directed to our address given below.

Respectfully submitted,

/Damond E. Vadnais/
Damond E. Vadnais
Attorney for Applicants
Registration No. 52,310

FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, New York 10104-3800
Facsimile: (212) 218-2200

FGHS_WS 4856110v1